



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
WASHINGTON, D.C. 20460

July 19, 1990

OFFICE OF
SOLID WASTE AND EMERGENCY
RESPONSE

Mr. Bill Birdwell
Executive Vice President
Tanknology Corporation International
5225 Hollister Street
Houston, Texas 77040-6294

Dear Mr. Birdwell:

This responds to your June 29 letter requesting clarification about EPA's underground storage tank (UST) requirements for release detection of pressurized lines from the tank to the dispenser. Your specific question was whether such pressurized lines at UST sites that have monitoring wells around the tank pits, but not along the piping runs, must also have an annual line pressure test.

As you probably know, under the EPA UST requirements (and Florida's, I believe) all existing pressurized lines must have emergency shut-off, flow-restrictor, or continuous alarm systems by December 22, 1990. That must be backed up by a monthly monitoring method or an annual line test. The location and number of monitoring wells must be sufficient to detect releases from any portion of the tank system that routinely contains product (Section 280.43 (F)(7)). Thus, if a tank excavation is intercepted by observation wells, but a pressurized line system extends beyond the designed reach of those monitoring wells, then an annual line test (or same other acceptable method of monthly detection) is in order. The intent of our release detection requirements is to identify a release quickly before it becomes a significant corrective action.

I cannot reliably speak to Florida's requirements. However, a site with fractures and fissures or surrounded by silts and clays would not appear to meet our requirement for using groundwater monitoring only in course to medium sands, gravel, coarse silts, or other similarly permeable materials (Section 280.43(f)(2)). The point of the site requirement is to assure that a release makes its way unimpeded to the monitoring well.

I hope this information is helpful to you. I suggest you contact Marshall Mott-Smith with any questions about the Florida UST requirements at (904) 461-3935.

Sincerely,

/s/

David O'Brien, Chief
Standards Branch
Office of Underground storage Tanks